

Criminal Complaint

From: linh-tran: stephens, the one and only Authorized Agent of LINH TRAN STEPHENS
c/o 11063 S Memorial Dr Ste D #235, Tulsa, Oklahoma [74133]

February 11th, 2025

To: Whom it may concern,

Re: Criminal Complaint Pursuant to Oklahoma and Federal Code of Criminal Procedure Acts

STATE OF OKLAHOMA)
) ss
COUNTY OF TULSA)

i, the flesh and blood woman known as linh-tran: stephens the one-and-only Authorized Representative for LEGAL ENTITY LINH T. STEPHENS a/k/a LINH TRAN STEPHENS, hereinafter referred to as “Affiant”. Affiant was born in 1984 and educated to postgraduate education of medical school, being of sound mind and legal age, lives upon the land in care of 11063 S Memorial Dr Ste D #235, Tulsa, Oklahoma without USDC, ZIP exempt, near [74008]; affiant makes this Affidavit of Truth of my own free will, and i hereby affirm, declare and swear, under oath and under the pains and penalty of perjury and under the laws of the united states of America and of this state, do hereby attest that the statements, averments and information contained in this Affidavit are true and correct to the best of my knowledge and belief, as i have first-hand knowledge of the facts contained herein. Further, i deny all past, present and future allegations, claims, charges, and alleged commercial debts against me and i demand strict proof of ALL such claims by alleged first-hand witnesses by sworn affidavit signed before a private notary and to be certified mailed to me within 30 days from the date of this letter.

1. Accused’s Identity

Under 18 U.S. Code § 1961(3), the **Person** whom I accuse include, but are not limited to, B.A.R. CARD ATTORNEYS: MARTHA RUPP CARTER, THERESA DREILING, KEVIN GRAY, JULIE DOSS, RODNEY SPARKMAN, **APRIL SEIBERT, DEBORRAH LUDI-LEITCH**, TODD CHESBRO, LORETTA RADFORD, DOUG DRUMMOND, DAWN MOODY, ROBERT PERUGINO, LARA M. RUSSELL, YVONNE KAUGER, JAMES R. WINCHESTER, JAMES E. EDMONDSON, DOUG COMBS, NOMA GURICH, RICHARD DARBY, DANA KUEHN, C.J., J.J., MATTHEW J. KANE IV, ROBERT D. BELL, V.C.J., THOMAS E. PRINCE, CLAIRE V. EAGAN, GREGORY K. FRIZZELL, JOHN HEIL, **STEPHEN E. HALE**, SADIE TEMPLE, MEGAN M. BECK, PEGI HADDOCK, KIMBERLY JANTZ, LARISA GRECU-RADU, STEVE KUNZWEILER, AUNGELA SPURLOCK, TRACY NESTER, GINA HENDRYX, RICHARD ROSE, TAYLOR HENDERSON, JOHN MICHAEL O’CONNOR, GENTNER DRUMMOND, STEVE JOHNSON, BENJAMIN WATERS, ISAAC SHIELDS, MATTHEW BALLARD, **EMMALENE STRINGER, GILBERT PILKINGTON, JR., CIERRA N FREEMAN**, CHANDLER MOXLEY, DALE WARNER, ERICA PARKS, MARY JOHNMEYER (for CHARLES SCHWAB AND CO., INC. not Tulsa County), COURT CLERK KACHARRA MANSKER, BAILIFF SAMANTHA BOEN, TRIAL COURT ADMINISTRATOR KIM HALL, DHS CHILDS SUPPORT SERVICES (CSS) employees RENEE BANKS, JASON HOENSHALL, TRIAL COURT ADMINISTRATOR VICKI COX, and ADA 504 COORDINATOR KATHY BURROWS, and other

members of the State Bar of Oklahoma, including prosecutors, lawyers and judges who engaged in the conspiracy of furtherance of this Federal ERISA funds embezzlement racketeering scheme.

Under 18 U.S. Code § 1961(4), the **Enterprise** which I accuse include, but are not limited to, the **Tulsa County District Court and Rogers County Court's** judges and special judges, **Oklahoma Supreme Court** judges, and the **State Bar of Oklahoma** members and court actors named in previous paragraph.

2. Offense Charged

I have good reason to believe and do believe that the accused committed the following racketeering predicate acts: 18 U.S. Code § 664. 18 U.S. Code § 1341. 18 U.S. Code § 1343. 18 U.S. Code § 1963 (racketeering organized crime). **Oklahoma 21 O.S. § 1531 - Forgery. 21 O.S. § 491 - Perjury. 21 O.S. § 1533 - Tampering with Records. 21 O.S. § 2041 - Tampering with or Fabricating Physical Evidence. 21 O.S. § 42 - Criminal Attempt. 21 O.S. § 421 - Conspiracy.**

3. RICO elements

RICO Predicate Acts: 18 U.S. Code § 664. 18 U.S. Code § 1341. 18 U.S. Code § 1343.

Other Predicate or Overt acts under conspiracy:

- Concealment
- Damage control
- Troll the cause of action statute time
- Acquiescence
- Status update
- Ensure other members the situation is under control.
- Half-truth statement
- Intentionally or knowingly by words or physical extrajudicial action prevents the execution of any process in a RICO civil cause.
- 18 U.S. Code § 1512

(b) **knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to**

(1) **influence, delay, or prevent** the testimony of any person in an official proceeding;

(2) **cause or induce any person to—**

(A) **withhold testimony, or withhold a record, document, or other object**, from an official proceeding;

(B) **alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;**

(C) **evade legal process** summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or

(D) **be absent from an official proceeding to which such person has been summoned by legal process;**

(c) Whoever **corruptly—**

(1) **alters, destroys, mutilates, or conceals a record, document, or other object, or attempts to do so, with the intent to impair the object's**

integrity or availability for use in an official proceeding; or
(2) otherwise obstructs, influences, or impedes any official proceeding, or attempts to do so.

Pattern: As early as at least 2017 to present.

Offense: 1962 (a) **any member of the State Bar of Oklahoma or any alleged Oklahoma courts actor** who has **received any income (legal fees or political contributions, future pension fund)** derived, **directly or indirectly, from a pattern of 18 U.S. Code § 664 predicates acts**, to use or invest, **directly or indirectly**, any part of such fees, or the proceeds of such fees, in acquisition of any interest in, or the establishment or operation of the State Bar of Oklahoma and alleged Oklahoma courts which is engaged in, or the activities of which affect, interstate or foreign commerce.

(b) **Any member of the State Bar of Oklahoma or any alleged Oklahoma courts actor** through a pattern of **18 U.S. Code § 664 predicates acts** to acquire or maintain, **directly or indirectly, any interest in or control of the State Bar of Oklahoma and alleged Oklahoma courts** which is engaged in, or the activities of which affect, interstate or foreign commerce.

(c) **Any person employed by or associated with the State Bar of Oklahoma or alleged Oklahoma courts** engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, **directly or indirectly**, in the conduct of such **the State Bar of Oklahoma or any alleged Oklahoma courts** affairs through a **pattern of 18 U.S. Code § 664 predicates acts**.

(d) **Any member of the State Bar of Oklahoma or any alleged Oklahoma courts actor** to **conspire to** violate any of the provisions of subsection (a), (b), or (c) of this section.

4. Time and Place of Offense

At least since 2017 to present, state wide and decades long. The racketeering predicate acts are still ongoing, including cases of Wade Reeves and Linh Stephens, etc.

5. Statute limitation

5-year statute of limitations for non-capital federal offenses, as set forth in 18 U.S.C. § 3282(a). For RICO, the clock starts from the last predicate act, which is still ongoing.

6. Venue

The venue is proper under 22 O.S. § 123 - Venue of Criminal Actions.

The offense of engaging in organized criminal activity may be prosecuted in any county in which any act is committed to effect an objective of the combination.

7. Authority

18 U.S. Code § 664 – Theft or embezzlement from employee benefit plan

Any person who embezzles, steals, or **unlawfully and willfully** abstracts or converts to his **own use or to the use of another, any of the moneys**, funds, securities, premiums, credits, property, or other assets of any employee welfare

benefit plan or **employee pension benefit plan**, or of any fund connected therewith, shall be fined under this title, or imprisoned not more than five years, or both.

18 U.S. Code § 1961 – Definitions (1)

“racketeering activity” means (A) any act or threat involving ... section **664** (relating to embezzlement from pension and welfare funds), ... section 1341 (relating to mail fraud), section 1343 (relating to wire fraud) ...

43 O.S. § 121 - Jurisdiction for Qualified Domestic Relations Order

Jurisdiction: The court that issues a divorce decree has jurisdiction over matters concerning division of retirement benefits.

Qualified Domestic Relations Order: a QDRO can be utilized in Oklahoma to satisfy the division of pension plans in compliance with federal law.

Equitable Distribution: The court has the authority to create orders that govern the distribution of retirement benefits as part of the equitable division of marital property..

29 U.S. Code § 1056 - Form and payment of benefits

(d) Assignment or alienation of plan benefits

(1) Each pension plan shall provide that benefits provided under the plan **may not be** assigned or **alienated**.

29 U.S. Code § 1144 - Other laws

(a) Supersedure; effective date

Except as provided in subsection (b) of this section, the provisions of this subchapter and subchapter III **shall supersede any and all State laws** insofar as they may now or hereafter relate to any employee benefit plan described in section 1003(a) of this title and not exempt under section 1003(b) of this title. This section shall take effect on January 1, 1975.

8. Legal Theory

A. Unlawful QDRO

The Third Circuit and the Supreme Court “agree that **a court may be an enterprise within the meaning of RICO**. See *United States v. Bacheler*, 611 F.2d 443, 450 (3d Cir. 1979) (Philadelphia Traffic Court); *United States v. Herman*, 589 F.2d 1191 (3d Cir. 1978), cert. denied, 441 U.S. 913, 99 S.Ct. 2014, 60 L.Ed.2d 386 (1979) (Pittsburgh Magistrates); *United States v. Vignola*, 464 F. Supp. 1091, 1095 (E.D.Pa.), aff’d mem., 605 F.2d 1199 (3d Cir. 1979), cert. denied, 444 U.S. 1072, 100 S.Ct. 1015, 62 L.Ed.2d 753 (1980), (Philadelphia Traffic Court).” *Averbach v. Rival Mfg. Co.*, 809 F.2d 1016, 1018 (3d Cir. 1987).

The Second Circuit and the Supreme Court “has previously held that **a governmental unit can be a RICO enterprise**. See *United States v. Angelilli*, 660 F.2d 23, 30-35 (2d Cir. 1981), cert. denied, 455 U.S. 910, 945, 102 S.Ct. 1258, 1442, 71 L.Ed.2d 449, 657 (1982).” *De Falco v. Bernas*, 244 F.3d 286, 307-8 (2d Cir. 2001).

The Fifth Circuit said, “[i]t is well established that **a government unit with multiple sub-departments can be a RICO enterprise**. *United States v. Stratton*, 649 F.2d 1066, 1074 (5th Cir. 1981). **A state's judicial branch qualifies as an enterprise under RICO**” *U.S. v. Walker*, 348 F. App'x 910, 912 (5th Cir. 2009).

Oklahoma special judges or associate judges are not entitled to judicial immunity because their courts do not possess jurisdiction to render a Qualified Domestic Relations Order (QDRO) for abstracting any funds from an employee pension benefit plan. Under 29 U.S.C. §§ 1056 and 1144, any action to divert money from an employee pension benefit plan is barred unless expressly authorized by state law. Furthermore, Tex. Fam. Code § 9.101 **limits the**

jurisdiction to render a QDRO to the trial court—namely, the **district court**—and **only** after a divorce decree has been issued.

Therefore, **before the divorce finalized or before retirement age**, neither ERISA law nor state law permits a Oklahoma associate judge or judge (the State Bar of Oklahoma member dressed in robe) to render a temporary Qualified Domestic Relations Order in the special judge or associate judge's court or district court to divert money out of the employee pension benefit plan to award fees to attorney (the State Bar of Oklahoma member dressed in suit) or alleged child support debts or any alleged debts.

"Webster defines the word '**unlawful**' as follows: 'Not lawful; contrary to law; illegal; **not permitted by law.**' * * * The word 'unlawful' as defined by Bouvier in his Law Dictionary is 'That which is contrary to law.' Another definition is: '**Unlawful** implies that an act is done or **not done as the law allows or requires.**'" *Punchard v. State*, 122 Tex. Crim. 134, 138 (Tex. Crim. App. 1932).

The Supreme Court of Texas ruled that, a Qualified Domestic Relations Order is a **final, appealable** order and an **exclusive** trial remedy available either under a rendered **post-divorce** decree or through a **post-trial petition**. See *Gainous v. Gainous*, 219 S.W.3d 97, 104-05 (Tex. App. 2006) and *Dalton v. Dalton*, 551 S.W.3d 126, 138 (Tex. 2018).

Any temporary Qualified Domestic Relations Order rendered in the special judge or associate judge's court or district court is unlawful, as it willfully diverts money from an employee pension benefit plan to award Oklahoma family court lawyers or child support services. This constitutes federal offense under 18 U.S.C. § 664, a predicate act defined in 18 U.S.C. § 1961.

I allege the above-mentioned RICO persons and enterprises commit a **decade-long, statewide, ongoing racketeering scheme** to siphon both in-state and out-of-state ERISA funds into the pockets of State Bar of Oklahoma members.

B. Alter and Forgery

"Webster's defines 'alter' as 'to cause to become different in some particular characteristic...' ... American Heritage similarly defines alter as '[t]o change or make different; modify.' ... these definitions to comport with the ordinary meaning of the word 'altered.'" *U.S. v. Carter*, 421 F.3d 909, 912 (9th Cir. 2005). "Forgery has been defined as 'the false making or materially altering, with intent to defraud, of any writing, which, if genuine, might apparently be of legal efficacy, or the foundation of legal liability.'" *United States v. Jones*, 648 F.2d 215, 217 (5th Cir. 1981) (quoting *Hubsch v. United States*, 256 F.2d 820, 823 (5th Cir. 1958)).

I allege aforementioned court actors on page 1 **altered court order**.

9. Statement of Facts

1. I am a living breathing 41-year-old woman individual with all my rights reserved without prejudice and without recourse. I am NOT dead to have my retirement account being passed onto any children. My last living will and testament specified that if I die, I will leave behind \$1,000.00 for my daughter G.L. Stephens. I am still alive and is 41 year-old today and I am NOT retiring nor consenting to anything being withdrawn from my banks or my retirement accounts.
2. I have NEVER disclosed any financial information to OKDHS CSS other than my Bank of America print-out final balance of \$0.00 sheet; and my court appointed attorney is simply a "dictionary only attorney" (named **Cierra Freeman**) without any power of attorney nor ability to file anything nor consenting to anything on my behalf, but somehow CSS illegally

obtained the information and the bank accounts numbers of other banks e.g. Charles Schwab retirement accounts, possibly by collusions between lawyers and DHS employees who are not judges yet pretending to be judges, violating exclusionary rules of evidence which is based in constitutional rights, it is a court-created remedy and deterrent, not an independent constitutional right—the purpose of the rule is to deter law enforcement officers from conducting searches or seizures in violation of the **Fourth Amendment** and to provide remedies to defendants whose rights have been infringed.

3. These alleged “court orders” to levy and liquidate all Plaintiff’s IRA accounts are VOID court orders as these administrative judges did NOT sign off on any of them initially and then signed off after the accounts were already liquidated/seized. Even after requesting proof of the actual order signed by an alleged article three judge, Defendants did NOT produce any proof. These alleged orders are being produced fraudulently by lawyers and by DHS administrative employees thus are all **frauds and R.I.C.O. Conspiracy (Racketeering Influenced and Corrupt Organizations)**.
4. Alleged child-support debt of OAH No.: 23-00313-73, OK IV-D FGN: 000948641001 Stephens vs. Stephens (my first marriage, my one and only divorce) was already finalized in January 2016 in the state of Oregon “Jeep and Trailer [fully loaded] in lieu of child support from Mother to Father”, and that finalized divorce/agreement/court-order/court-decree was incorporated into Oklahoma Court on 07/11/2017. I did NOT agree to any **breaching of that contract**. I requested numerous times for **offset and counterclaims** to CSS but were deprived of any due process.
5. I remarried in 2017 to a man, whose fictional name will be “JOHN DOE” herein, who is a nonparty to divorce case Stephens vs. Stephens (my first marriage) and a nonparty to the child-support case Stephens vs. Stephens. All of husband JOHN DOE and Plaintiff’s Charles Schwab retirement accounts including Rolled-over 401(k) accounts in dispute were unlawfully liquidated and stolen by OKDHS for a different marriage’s divorce; these accounts were all earned during my second marriage, a marriage that is still ongoing and has never been divorced, from Summer of 2018 to 2020 and onward, and therefore belong to second marriage’s marital asset; AGAIN, that second marriage is still alive and healthy and is NOT a party to any divorce nor child-support proceedings. These facts have been made known to OKDHS and Charles Schwab repeatedly but were ignored.
6. Specifically, all of the accounts whose values added up to approximately \$65,000 were all retirement accounts (one was 401k rollover IRA, another was regular IRA, another was Roth IRA) related to employment with Indian Health Services Cherokee Nation, except for one small brokerage investment account of \$472.69 that was not a retirement account. I have NOT contributed to retirement since I was laid off by Indian Health Services Cherokee Nation (as a federal employee) near the end of 2020, and prior to I have only worked for the Veteran Affairs office and worked for the U.S. Navy, **all federally protected retirements which were unlawfully seized without a warrant by OKDHS and State of Oklahoma**.
7. All of my retirement accounts are federally protected from child support garnishment prior to reaching retirement age. I was only 40 years old when these crimes were perpetrated against me and my current husband, who is a nonparty to Stephen’s child support case. Neither of us was retiring at the time—and we still are not—nor did we consent to any such actions. Despite this, the defendants ignored our rights and proceeded to liquidate our accounts on May 07, 2024, at 10 AM Central Time, which occurred two days before the scheduled court date of May 09, 2024, regarding the liquidation. [See Exhibit 08 of

federal civil lawsuit 24-CV-216-JDR-CDL for evidence of crimes committed against the plaintiff without consent, while dismissing the plaintiff's continuous objections and rebuttals communicated through numerous final notices, cease and desist certified letters, emails, phone calls, faxes, and complaints.] What is particularly shocking is the willful and utter disregard for the law and due process exhibited by these court actors, as the liquidation commenced two days prior to the "Administrative Review Hearing regarding levying and liquidation" set for May 09, 2024, at 8:30 AM. These actions demonstrate that the defendants had premeditated plans to engage in fraudulent activities collectively, systematically depriving the plaintiff of due process rights, thus reflecting a willful and orchestrated violation of rights akin to organized crime.

8. Protection of Retirement Accounts ignored by OKDHS:

- **Federal Protection: Retirement accounts, particularly those governed by ERISA (Employee Retirement Income Security Act), are generally protected from garnishment for child support or attorney fees, unless a qualified domestic relations order (QDRO) is issued through state courts, which a qualified QDRO was NEVER issued.**
- **Age Considerations: plaintiff was only 40 years old at the time of violations, reinforcing that retirement plans should be protected until actual retirement occurs (which would be 25 years from now).**

9. Due Process Violations

- **Pre-Liquidation Activity: liquidations began *two days prior* to a scheduled hearing, suggesting a lack of due process. This action is described as calculated and premeditated, intended to deny the plaintiff the ability to contest these actions effectively.**
- **Notice and Opportunity to be Heard: The statutory requirement for notice and an opportunity for a hearing is fundamental in due process claims. The timeline here raises questions about whether the plaintiff effectively received a fair chance to contest the liquidation.**

10. Part of the racketing income abstracted from ERISA funds by the members, have been used, directly and indirectly to operate the enterprise, the State Bar of Oklahoma. (**18 U.S. Code § 1962(a)(c)**). The other members of the State Bar of Oklahoma (prosecutors working in the executive branch) have been conspiring to use their authority and power to conceal the RICO crime by refusing to prosecute.

10. RICO conspiracy is broad liberally construed to effectuate its remedial purposes

"If conspirators have a plan which calls for some conspirators to perpetrate the crime and **others to provide support, the supporters are as guilty as the perpetrators**. ... "[P]lainly a person may conspire for the commission of a crime by a third person."...A person, moreover, may **be liable for conspiracy even though he was incapable of committing the substantive offense.**" *Salinas v. United States*, 522 U.S. 52, 64 (1997).

"RICO is to be **read broadly**. ... RICO is to **"be liberally construed to effectuate its remedial purposes,"** ... The statute's **"remedial purposes"** are **nowhere more evident** than in the provision of a private action for those injured by racketeering activity. ... Far from effectuating these purposes, the **narrow readings** offered by the dissenters and the court below **would in effect eliminate § 1964(c)** from the statute." *Sedima* at 497-98.

Conspiracy is serious business, control damage or attempt to conceal a conspiracy are statements made "in furtherance of" conspiracies. Pursuant to the precedents, the Seventh

Circuit's pronouncement stated:

"Under the reasonable basis standard, a statement may be susceptible to alternative interpretations and still be 'in furtherance of the conspiracy.' Shoffner, 826 F.2d at 628. Yet, the statement need not have been made exclusively, or even primarily, to further the conspiracy in order to be admissible under the co-conspirator exception. United States v. Johnson, 200 F.3d 529, 533 (7th Cir. 2000); United States v. Powers, 75 F.3d 335, 340 (7th Cir. 1996). Rather, the record need only contain some reasonable basis for concluding that the statement in question furthered the conspiracy in some respect. Stephenson, 53 F.3d at 845." U.S. v. Vallone, No. 04 CR 0372, 4 (N.D. Ill. Feb. 19, 2008).

"The Government has a relatively low burden of proof on the issue of whether a statement is made 'in furtherance' of a conspiracy. Shoffner, 826 F.2d at 628. Such statements can take on a variety of forms, and the Seventh Circuit has upheld the admission of a wide assortment of co-conspirators statements. For instance, statements used to recruit potential co-conspirators, id., update others on a conspiracy's progress, United States v. Potts, 840 F.2d 368, 371 (7th Cir. 1987), control damage to an ongoing conspiracy, United States v. Van Daal Wyk, 840 F.2d 494, 499 (7th Cir. 1988), plan or review co-conspirators' exploits, United States v. Molt, 772 F.2d 366, 369 (7th Cir. 1985), and attempt to conceal the conspiracy, United States v. Kaden, 819 F.2d 813, 820 (7th Cir. 1987), have been approved as statements made 'in furtherance of' conspiracies. In turn, the court recognizes that 'conspiracy is serious business, and talk about it among or by the conspirators should not be presumed to be unrelated to the accomplishment of the conspiracy's goals.' United States v. Pallais, 921 F.2d 684, 688 (7th Cir. 1990)." U.S. v. Vallone, No. 04 CR 0372, 4-5 (N.D. Ill. Feb. 19, 2008).

"Statements that are 'part of the information flow between conspirators intended to help each perform his role' are statements 'in furtherance.' United States v. Gajo, 290 F.3d 922, 929 (7th Cir. 2002); United States v. Hunt, 272 F.3d 488, 495 (7th Cir. 2001). ... Statements designed to conceal a conspiracy also are deemed to be 'in furtherance' where ongoing concealment is a purpose of the conspiracy. Gajo, 290 F.3d at 928-29. Therefore, 'statements made to keep co-conspirators informed about the progress of the conspiracy, to recruit others or to control damage to the conspiracy are in furtherance of the conspiracy. Stephenson, 53 F.3d at 845.' U.S. v. Vallone, No. 04 CR 0372, 5 (N.D. Ill. Feb. 19, 2008).

"We agree with the Seventh Circuit's pronouncement that statements 'in furtherance' of a conspiracy can take many forms, including statements seeking to control damage to an ongoing conspiracy and statements made in an attempt to conceal the criminal objectives of the conspiracy. See United States v. Doerr, 886 F.2d 944, 951 (7th Cir. 1989);" U.S. v. Broussard, 80 F.3d 1025, 1039 (5th Cir. 1996).

The Fifth Circuit ruled that, a statement is made in furtherance of the conspiracy if it advances the ultimate goal of the conspiracy. See *United States v. Phillips*, 219 F.3d 404, 419 (5th Cir. 2000). The Fifth Circuit "have repeatedly cautioned 'that the 'in furtherance' requirement is not to be construed too strictly lest the purpose of the [conspiracy statement non-hearsay] exception be defeated.'" *United States v. Fairley*, 880 F.3d 198, 214 (5th Cir. 2018).

11. Concealing this Complaint constitutes statement of conspiracy

"The same act cannot be both lawful and unlawful." *Corbitt v. New Jersey*, 439 U.S. 212,

233 (1978). "Acts generally lawful may become unlawful when done to accomplish an unlawful end, and a constitutional power cannot be used by way of condition to attain an unconstitutional result." *Gomillion v. Lightfoot*, 364 U.S. 339, 347 (1960).

"Because conspiracy is a **continuing** offense, "a defendant who has joined a conspiracy **continues to violate the law through every moment of the conspiracy's existence**, and he becomes responsible for the acts of his co-conspirators in pursuit of their common plot." ... A defendant's **membership in the ongoing unlawful scheme continues** until he withdraws.... we presume that Congress intended to preserve the common-law rule that **affirmative defenses** are matters for **the defendant to prove**." *United States v. Romans*, 823 F.3d 299, 320 (5th Cir. 2016).

"Direct evidence of a conspiracy is unnecessary; each element may be inferred from circumstantial evidence." *United States v. Casilla*, 20 F.3d 600, 603 (5th Cir. 1994). "The agreement may be inferred from a "concert of action." ...only 'slight' evidence is needed to connect an individual to that conspiracy." "'Knowledge of a conspiracy and voluntary participation in a conspiracy may be inferred from a 'collection of circumstances.'"" *U.S. v. Jensen*, 41 F.3d 946, 955 (5th Cir. 1995).

"Evidence of ... a conspiracy can be actual knowledge, overt actions with another, such as arming oneself in anticipation of apprehension, or **inferred from the knowledge of the alleged co-conspirator of the impropriety of the actions taken by the other co-conspirator**." *Doe v. McKesson*, 922 F.3d 604, 610 (5th Cir. 2019).

12. REQUEST

I REQUEST that the Magistrate issue a warrant pursuant to **22 O.S. § 122** for any offenses alleged within this complaint.

I DEMAND a comprehensive investigation into all unlawful Qualified Domestic Relations Orders (QDROs) issued by the Oklahoma Family Courts, particularly those associated with the corrupt processes of the County District Court and its actors.

Furthermore, I DEMAND that the Office of the Attorney General's Criminal Division be contacted to oversee this investigation.

Please take notice that failure to respond shall constitute tacit acquiescence to this Oklahoma statewide, decade long, ERISA funds embezzlement racketeering scheme, whereby you, as a member of the alleged RICO enterprise, voluntarily engage in damage control regarding all claims herein. This affidavit shall stand as evidence against these court actors on page one in all courts of record, demonstrating that everyone involved, with full **knowledge of the alleged impropriety of the actions taken by the other co-conspirator**.

Further, **please take notice** that any response not **verified** and submitted **under penalty of perjury** within **30 days** shall be deemed a **non-response** and constitute an act of concealment regarding all claims herein.

Avouchment / Verification

I hereby declare, certify and affirm, pursuant to the penalties of perjury under the laws of the united states of America, and by the provision of **28 U.S. Code § 1746** that all of the above and foregoing representations are true and correct to the best of my knowledge, information, belief.

Executed in Tulsa County, Oklahoma,

on this 11th day of February in the Year of Our Lord Two Thousand and Twenty Five.

PRIVATE; THIS IS NOT A PUBLIC COMMUNICATION

Notice to Agent is Notice to Principal, Notice to Principal is Notice to Agent,

Notice applies to all successors and assigns; Affidavit is a Form of Evidence;
unrebutted affidavit stands as truth in commerce,

Silence is Tacit Acquiescence/Agreement/Dishonor;

*This communication is in no way forming a contract nor requesting any
contracting; it is simply a notice regarding the matters at hand. This
communication is not intended to nor does it create nor confirm any
professional-client relationship or any type of relationship between us;*

Private sector autograph;
WITHOUT RECOURSE

*without prejudice
linh-tran:stephens/Agent*

By beneficiary:

All Rights Reserved – **Without Prejudice, UCC 1-308 and UCC 1-103**– Non Assumpsit,
Grantor, the only Authorized Agent & Representative for LINH TRAN STEPHENS® ens legis
and all derivatives thereof, Sovereign People, sui juris, unlimited, Ambassador of Christ
“freeman of the Union” per Honorable Mr. Justice MILLER on April 14th, 1983, in the
Slaughter-House cases, 83 US 36 (a SCOTUS case specifically mentioned in 8 FAM 102.3),

A living woman breathing with a living soul and the Holy Spirit of Creator YAHUAH,
full capacity and competency with postgraduate level of education past medical school,
non-incorporated, non-sole-proprietor, living on the land of the republic, with God-given rights,
NOT a “public servant”/“government employee”/“pauper”/“ward of State”, nor “U.S. citizen”,
c/o 11063 S Memorial Dr Ste D #235, Tulsa, Oklahoma [74133] union state, without USDC,
LinhStephens7@gmail.com

Notary as JURAT CERTIFICATE

STATE OF MINNESOTA)

) ss

COUNTY OF SHERBURNE)

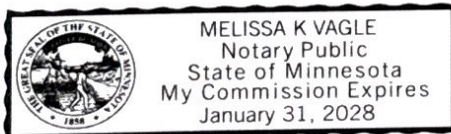
On this 11th day of February, 2025 before me, Melissa K. Vagle, a Notary Public, personally
appeared a living woman Linh Tran Stephens (the Authorized Representative and Beneficiary
for Legal Fiction LINH TRAN STEPHENS), who electronically (remotely) proved to me on the
basis satisfactory evidence to be the woman whose name is subscribed to the within instrument
and acknowledged to me that she executed the same in her authorized capacity, and that by her
autograph on the instrument the woman executed, the instrument.

I certify under PENALTY OF PERJURY under the lawful laws of Minnesota State and that the
foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Melissa K. Vagle

Signature of Notary/Jurat or Person Administering Oath's Signature



linh-tran: stephens, one and only Authorized Representative and beneficiary of LEGAL ENTITY
LINH TRAN STEPHENS
c/o 11063 S Memorial Dr Ste D #235, Tulsa, Oklahoma [74133]
LinhStephens7@gmail.com
817-631-3223 (cellphone)

AFFIDAVIT FOR CRIMINAL CONSPIRACY

TITLE 18 U.S.C. §241 AND 242

The undersigned, of lawful age, does swear and states the following facts:

- A) On or about November 23, 2023, and again on December 06, 2024, Emmalene Stringer, Adam Sylvester Stephens, and Gilbert J. Pilkington Jr, the persons portraying themselves as Prosecuting Attorneys for Tulsa County, State of Oklahoma did, in their official capacity, deprive Linh Tran Stephens ("victim") of rights secured by and enumerated in the Constitution for the United States of America, when they charged the victim for an infamous or capital crime by INFORMATION, and not by indictment from a Grand Jury, as required by law.
- B) On or about February 07, 2024 and again on December 06, 2024, Deborrah Ludi Leitch followed by Loretta Radford, are persons portraying themselves as judicial officers, for Tulsa County, State of Oklahoma did, in their official capacity, conspire by and between, Emmalene Stringer, a person portraying themselves as a Prosecuting Attorney for Tulsa County, State of Oklahoma, in their official capacity; a person portraying themselves as a law enforcement officer for the Tulsa City, Tulsa County, State of Oklahoma, in their official capacity; to deprive Linh Tran Stephens ("victim") of rights secured by and enumerated in the Constitution for the United States of America, when the victim was held to answer for an infamous or capital crime by INFORMATION in lieu of indictment by a Grand Jury, as required by Clause 1 of Amendment 5 to the Constitution for the United States of America.

These acts were against the peace and dignity of the United States of America, by agents of a state subjected to the jurisdiction thereof.

WHEREFORE, affiant prays that this information be investigated and found to be true and correct and that a true bill for the arrest of the within named defendants and that he/she/they may be brought before a magistrate and held for the offenses of:

1. Deprivation of Rights under Color of Law (Title 18 U.S.C. §242)
2. Conspiracy to Deprive of Rights (Title 18 U.S.C. §241)
3. Kidnapping (Title 18 U.S.C. §1201)
4. Any other criminal acts found to be true, as ascertainable by the evidence on the record and as required by law.

I, Linh Tran Stephens, do verify under the penalty of perjury, under the Laws of the United States of America that the foregoing is true and correct and that the infamous crimes above mentioned, did occur in my presence and that I am empowered to enforce and defend the Laws of the United States of America, as a person subjected to the Supreme authority of the Constitution for the United States of America.

This affidavit is sworn to be true and correct and has full force of law and does not need to be verified by Notary Public.

Signed this 06th day of February, 2025 in Tulsa County, State of Oklahoma, United States of America.

Respectfully & Peacefully

a Servant of Justice,

without prejudice
linh-tran: stephens / Agent

Citizen of the United States of America

AFFIANT **linh-tran: stephens, one and only Authorized Representative and beneficiary of LEGAL ENTITY**
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AFFIDAVIT FOR CRIMINAL CONSPIRACY

TITLE 18 U.S.C. §241 AND 242

The undersigned, of lawful age, does swear and states the following facts:

- A) On or about December 03, 2021, Bridget O'brien a/k/a Bridget Menser, a person portraying themselves as an agent of the State for Tulsa County, State of Oklahoma did, in their official capacity, deprive Linh Tran Stephens ("victim") of rights secured by the Constitution for the United States of America and incorporated by the United States Supreme Court in Roberts v. United States, when they interfered with the familial units right of Intimate Association through the removal of a child from the care of their mother and/or father.
- B) On or about December 03, 2021, Martha Rupp Carter, Theresa Dreiling, Julie Doss, and Rodney Sparkman, followed by June 01, 2022, April Seibert, the persons portraying themselves as a judicial officer, for Tulsa County, State of Oklahoma did, in their official capacity, conspire by and between, a person portraying themselves as an agent of the State for Tulsa County, State of Oklahoma, in their official capacity; a person portraying themselves as a law enforcement officer for the Tulsa County, State of Oklahoma, in their official capacity; to deprive Linh Tran Stephens ("victim") of rights secured by the Constitution for the United States of America and incorporated by the United States Supreme Court in Roberts v. United States, when they interfered with the familial units right of Intimate Association when the child was not returned to the care of their familial unit.

These acts were against the peace and dignity of the United States of America, by agents of a state subjected to the jurisdiction thereof.

WHEREFORE, affiant prays that this information be investigated and found to be true and correct and that a true bill for the arrest of the within named defendants and that he/she/they may be brought before a magistrate and held for the offenses of:

1. Deprivation of Rights under Color of Law (Title 18 U.S.C. §242)
2. Conspiracy to Deprive of Rights (Title 18 U.S.C. §241)
3. Kidnapping (Title 18 U.S.C. §1201)
4. Any other criminal acts found to be true, as ascertainable by the evidence on the record and as required by law.

I, Linh Tran Stephens, do verify under the penalty of perjury, under the Laws of the United States of America that the foregoing is true and correct and that the infamous crimes above mentioned, did occur in my presence and that I am empowered to enforce and defend the Laws of the United States of America, as a person subjected to the Supreme authority of the Constitution for the United States of America.

This affidavit is sworn to be true and correct and has full force of law and does not need to be verified by Notary Public.

Signed this 18th day of November, 2024 in Tulsa County, State of Oklahoma, United States of America.

Respectfully & Peacefully

a Servant of Justice,

without prejudice
linh-tran: stephens / Agent

Linh Tran Stephens

Citizen of the United States of America

AFFIANT **linh-tran: stephens, one and only Authorized Representative and beneficiary of LEGAL ENTITY**
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